

**UNITED STATES BANKRUPTCY COURT**  
**Northern District of California**

In re:	)	Bankruptcy No.: 23-30662 (HLB)
	)	R.S. No.: 1
INTERNATIONAL LONGSHORE	)	Hearing Date: December 7, 2023
AND WAREHOUSE UNION,	)	Time: 1:00 pm PST
Debtor(s)	)	
_____	)	

**Relief From Stay Cover Sheet**

Instructions: Complete caption and Section A for all motions. Complete Section B for mobile homes, motor vehicles, and personal property. Complete Section C for real property. Utilize Section C as necessary. If moving party is not a secured creditor, briefly summarize the nature of the motion in Section D.

(A) Date Petition Filed: Sept 30, 2023 Chapter: 11  
Prior hearings on this obligation: None Last Day to File §523/§727 Complaints: \_\_\_\_\_

(B) Description of personal property collateral (e.g. 1983 Ford Taurus):

Secured Creditor ☐ or lessor ☐  
Fair market value: \$ \_\_\_\_\_ Source of value: \_\_\_\_\_  
Contract Balance: \$ \_\_\_\_\_ Pre-Petition Default: \$ \_\_\_\_\_  
Monthly Payment: \$ \_\_\_\_\_ No. of months: \_\_\_\_\_  
Insurance Advance: \$ \_\_\_\_\_ Post-Petition Default: \$ \_\_\_\_\_  
No. of months: \_\_\_\_\_

(C) Description of real property collateral (e.g. Single family residence, Oakland, CA):

Fair market value: \$ \_\_\_\_\_ Source of value: \_\_\_\_\_ If appraisal, date: \_\_\_\_\_

Moving Party's position (first trust deed, second, abstract, etc.):

Approx. Bal. \$ _____	Pre-Petition Default: \$ _____
As of (date): _____	No. of months: _____
Mo. payment: \$ _____	Post-Petition Default: \$ _____
Notice of Default (date): _____	No. of months: _____
Notice of Trustee's Sale: _____	Advances Senior Liens: \$ _____

Specify name and status of other liens and encumbrances, if known (e.g. trust deeds, tax liens, etc.):

Position	Amount	Mo. Payment	Defaults
1 <sup>st</sup> Trust Deed: _____	\$	\$	\$
2 <sup>nd</sup> Trust Deed: _____	\$	\$	\$
_____:			
_____:			
_____:			
(Total)	\$	\$	\$

Other pertinent information: The Debtor's Ex Parte Application filed on November 7, 2023 [Dkt 72] and subsequently noticed for hearing [Dkt 80] seeks an order that its appeal of an adverse decision issued by the National Labor Relations Board, dated April 6, 2023, falls within the ambit of 11 U.S.C. § 362(b)(4) and is not subject to the automatic stay.

Dated: November 17, 2023

\_\_\_\_\_  
*/s/ Jason Rosell*  
Signature

\_\_\_\_\_  
Jason Rosell  
Print or Type Name

Attorney for Debtor